

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JONATHAN CONCEPCION,  
Defendant

Crim. No. 99-315 (DRD)

**MOTION REQUESTING CONTINUANCE OF REVOCATION HEARING**

TO THE HONORABLE DANIEL DOMINGUEZ,  
SENIOR UNITED STATES JUDGE  
FOR THE DISTRICT OF PUERTO RICO

COMES NOW, *Mr. Concepcion*, the defendant herein, represented by the Federal Public Defender for the District of Puerto Rico, and before this Honorable Court respectfully states and prays:

1. The revocation hearing as to Mr. Concepción is scheduled for January 10<sup>th</sup>, 2007.
2. On December 28, 2007, the revocation hearing for Mr. Concepción was continued. Mr. Concepción wanted to speak with the undersigned, who is the Assistant Federal Public Defender (“AFPD”) assigned to his case.
3. The undersigned will be on trial on January 10 and 11, therefore will not be able to be present during the revocation hearing.
4. I understand that any AFPD could substitute the undersigned, however, according to the information provided by brother-counsel Rafa Andrade, there appears to be a misunderstanding regarding the legal advice provided by the undersigned to Mr. Concepción.
5. In an abundance of caution, and in order to avoid unnecessary litigation, the undersigned requests a continuance of the revocation for another date when he can be present.

**WHEREFORE**, it is respectfully requested that this Honorable Court reschedules the revocation hearing of Mr. Concepción.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the parties of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, January 9<sup>th</sup>, 2008.

**JOSEPH C. LAWS, JR.**  
FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF PUERTO RICO

**S/Max Pérez-Bouret**  
MAX PÉREZ-BOURET  
USDC-PR 222612  
AFPD for Defendant  
241 Franklin D. Roosevelt Avenue  
San Juan, PR 00918-2441  
Tel. (787) 281-4922  
Fax (787) 281-4899  
E-mail : [Max\\_Pérez@fd.org](mailto:Max_Pérez@fd.org)